

In The United States District Court
For the District of Delaware

OFFICE OF
ATTORNEY GENERAL

NOV 16 2005

RECEIVED
CORRECTION UNIT

James Hull
Plaintiff

v.

David Holman
Et. AL,
Defendants

CASE # NO. 04-1328-GMS

Plaintiff's Request for interrogatories

Plaintiff's Request for interrogatories

Pursuant to F.R.C.P. 26 And 33, of the federal Rules of Civil procedure, pursuant to The Appropriate F.R.C.P. and all other case authorities. The plaintiff Request for the defendant's Answer in writing and under oath the following interrogatories within (30) days of service

1. State the Duties of Defendant Mr. David Holman, Mr. Lawrence McQueen, Mr. Clyde D. Sagers as they pertain to inmates care, health, safety
2. State the Duties of Defendants SUPRA as they pertain to responding to and monitoring inmate grievances and emergency medical grievances
3. State the names, Titles and Duties of all Staff members at the Delaware correctional center who have responsibility for monitoring and assignment of classification housing and placement and Request's to be Relocated or moved to another cell

4. List any and all citations filed Against David Human, Laurence Megowan, Clyde D. Sagers at the Delaware Correctional Center, including condition of confinement, failure to protect
5. List any and all past litigation(s) that resulted in any consent decree and or favorable outcome for inmate plaintiffs, whether published or not published, which involve condition of confinement, and emergency medical grievances and medical treatment issues
6. please identify all positions and titles, with corresponding date of employment that you have held as an employee at Delaware Correctional Center describe your job responsibilities for each position and title
7. please describe in as much detail as possible the training you have received while working at Delaware Correctional Center for assessing inferences with regard to inmate health or safety pertaining to longstanding threats of bodily harm including but not limited to emergency situations
8. please describe in as much detail as possible any policy, procedure and practice that governs the procedure for serious medical needs, at Delaware Correctional Center.

9. please identify all officials responsible for formulating, implementing, and monitoring compliance with policies, procedures, and practices described in your response to interrogatory # 3
10. please describe in as much detail as possible the complete circumstances surrounding your policies and procedures against plaintiff
DA - 1-22-04
11. please state the name, affiliation, title (last known address) and last known telephone number of each person who has knowledge of any of the facts stated in your response to interrogatory # 10
12. please describe in as much detail as possible every policy, procedure and practice that governs the sick call for serious medical needs at Delaware Correctional Center
13. please identify each document as the term is defined in F.R.C.P. 34(e)(1). That evidence, mentions, or refers to any of the facts stated in your response to interrogatory # 10
14. please identify each person known to you and not otherwise identified in your answer to these interrogatories who has provided any information or assistance of whatever nature of description relating to any of your answers to these interrogatories

15. please identify each person who has made to you sworn or unsworn statements or provided information for affidavits or statements that relate to the allegations made in plaintiff's complaint and state the information provided

Plaintiff James Hall does hereby swear and certify under oath penalty of perjury that the instant discovery request is careful not improperly motivated, and not unreasonably burdensome or expensive.

Plaintiff seeks, pro se pleading learning under
James v. Kerner 404 U.S. 519 (1972)

James Hall

James Hall pro, se 167551

1151 indlock rd suptent AL 36827

11-9-05

Date